

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

Chapter 11

Case No. 23-00623

Jointly Administered

NOTICE OF FILING AND OBJECTION DEADLINE
FOURTH MONTHLY APPLICATION FOR COMPENSATION AND
EXPENSE REIMBURSEMENT FOR PATIENT CARE OMBUDSMAN
PERIOD December 1, 2023 – January 31, 2024

PLEASE TAKE NOTICE that, on February 7, 2024, the *Fourth Monthly Application for Compensation and Expense Reimbursement for Patient Care Ombudsman – Period December 1, 2023 – January 31, 2024* (the “**Application**”) was filed with the United States Bankruptcy Court for the Northern District of Iowa (the “**Court**”) at Docket No. 718.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Application or the relief requested therein must be made in accordance with the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 224] (the “**Interim Compensation Order**”) and must be filed with the Court at **111 7th Ave. SE, Cedar Rapids, IA 52401**, and served and received by the following parties listed in the Interim Compensation Order no later than **February 21, 2024, at 4:00 p.m. (Central Time)**:

- a. **Mercy Hospital**, Iowa City, Iowa, 500 E. Market Street, Iowa City, Iowa 52245, Attn: Mark E. Toney (noticing@mercycic.org);
- b. **Counsel to the Debtor**, (A) McDermott Will & Emery LLP, 444 W. Lake Street, Suite 4000, Chicago, Illinois 60606, Attn: Felicia Gerber Perlman, (fperlman@mwe.com), Daniel M. Simon (dsimon@mwe.com), and Emily C. Keil (ekeil@mwe.com) and 2501 North Harwood Street, Suite 1900, Dallas, TX 75201, Jack G. Haake (jhaake@mwe.com) and (B) Nyemaster Goode, P.C., 625 First Street SE, Suite 400, Cedar Rapids, IA 52401-2030, Attn: Roy R. Leaf (rleaf@nyemaster.com);
- c. **Counsel to the Committee**, Cutler Law Firm, P.C., 1307 50th Street, West Des Moines, IA 50266, Attn: Robert C. Gainer (rgainer@cutlerfirm.com) and SillsCummis & Gross P.C., The Legal Center, One Riverfront Plaza, Newark, NJ 07102, Attn: Andrew H. Sherman (asherman@sillscummis.com) and Boris Mankovetskiy (bmankovetskiy@sillscummis.com);
- d. **Office of the United States Trustee for the Northern District of Iowa**, 111 Seventh Avenue SE, Suite 2800, Cedar Rapids, IA, 52401, Attn: Janet G.L. Reasoner

(Janet.G.Reasoner@usdoj.gov); and

- e. **Counsel to the Bondholder**, Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., One Financial Center, Boston, MA 02111, Attn: William Kannel (wkannel@mintz.com), Nathan F. Coco (nfcoco@mintz.com), and Megan Preusker (mpreusker@mintz.com) and Whitfield & Eddy, P.C., 699 Walnut Street, Suite 2000, Des Moines, IA 5030, Attn: Peter J. Chalik (chalik@whitfieldlaw.com).

PLEASE TAKE FURTHER NOTICE that, if an objection is properly filed and served in accordance with the above procedures, a hearing (the “**Hearing**”) on the Application will be held at a time and date to be determined before the Honorable Thad J. Collins, United States Bankruptcy Judge, United States Bankruptcy Court for the Northern District of Iowa, 111 7th Ave. SE, Cedar Rapids, IA 52401. Only objections made in writing and timely filed and received will be considered by the Court at such Hearing.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE APPLICATION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER, THE DEBTORS MAY PAY THE FEES SOUGHT IN THE APPLICATION IN ACCORDANCE WITH THE INTERIM COMPENSATION ORDER.

DATED: February 7, 2024.

By: /s/Susan N. Goodman, RN JD
Pivot Health Law, LLC
Az Bar No. 019483; Tx Bar No. 24117585
P.O. Box 69734
Oro Valley, AZ 85737
Msg: 520.744.7061 | Fax: 520.575.4075
sgoodman@pivthealthaz.com
Patient Care Ombudsman

CERTIFICATE OF SERVICE

I, Susan N. Goodman, hereby certify that on February 7, 2024, a true and correct copy of the Application was filed with the Clerk of Court using Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to parties of this case.

DATED: February 7, 2024.

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